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*Attorneys for Defendant Capital One, N.A.,  
 erroneously sued as "Capital One Bank, N.A."*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Sean Bondocan

~~EVIGAIL GUTIERREZ,~~

Plaintiff,

v.

TRANS UNION, LLC, EQUIFAX  
 INFORMATION SERVICES, LLC;  
 EXPERIAN INFORMATION SOLUTIONS,  
 INC.; JP MORGAN CHASE BANK, N.A.;  
 SYNCHRONY FINANCIAL; AMERICAN  
 EXPRESS INC.; CAPITAL ONE BANK, N.A.;  
 and SILVER STATE SCHOOLS CREDIT  
 UNION,

Defendants.

CASE NO.: 2:23-cv-01334-JCM-VCF

**STIPULATION AND ORDER TO EXTEND  
 TIME FOR DEFENDANT CAPITAL ONE,  
 N.A. TO FILE RESPONSIVE PLEADING  
 TO COMPLAINT  
 (FIRST REQUEST)**

Pursuant to Local Rules 6-1 and 6-2, Plaintiff Sean Bondocan ("Plaintiff") and Defendant Capital One, N.A., erroneously sued as "Capital One Bank, N.A.," ("Capital One" and together with Plaintiff, the "Parties") stipulate and agree as follows:

**WHEREAS:**

1. Immediately upon being retained by Capital One, on the afternoon of December 1, 2023, counsel for Capital One reached out to Plaintiff's counsel to request additional time to file a responsive pleading;

2. On December 4, 2023, the Parties agreed that good cause exists to extend the responsive pleading deadline of Capital One to allow the newly engaged defense counsel time to

obtain and review a copy of the file and gather additional facts and information while continuing to devote resources to exploring the potential for early resolution of this matter;

3. The Parties agree to extend the deadline for Capital One to file its responsive pleading to the Complaint to December 22, 2023; and

4. This stipulation is made in good faith and not for the purpose of delay.

**NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended. Capital One shall file its responsive pleading on or before December 22, 2023.

DATED this 5th day of December, 2023.  
McDONALD CARANO LLP

DATED this 5th day of December, 2023.  
FREEDOM LAW FIRM, LLC

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*Attorneys for Plaintiff Sean Bondocan*

*Attorneys for Defendant Capital One,  
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Bank, N.A."*

**IT IS SO ORDERED:**

  
UNITED STATES ~~DISTRICT COURT~~ JUDGE  
Magistrate

DATED: 12-12-2023

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